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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC.,

Plaintiff,

v.

SHELDON ADELSON, et al.,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 2:19-cv-01667-ART-VCF

ORDER APPROVING (ECF No. 899)

STIPULATION REGARDING SEALING
DEFENDANTS' REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT
AND RELATED EXHIBITS

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
5 NEWS+MEDIA CAPITAL GROUP LLC, THE ESTATE OF SHELDON ADELSON, PATRICK
6 DUMONT, and INTERFACE OPERATIONS LLC dba ADFAM (collectively “Defendants”), by
7 and through their counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone,
8 Esq., hereby stipulate and agree as follows:

9 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer prior
10 to filing any additional motions to seal. ECF No. 619. The parties’ met-and-conferred on August
11 30, 2023, regarding sealing relating to Defendants’ Reply in Support of Motion for Summary
12 Judgment and related exhibits (the “Reply”). Lucy Crow, Esq., on behalf of the Sun, and Mona
13 Kaveh, Esq., on behalf of Defendants, engaged in a meet and confer.

14 2. The parties agree that the following, and any references thereto, are appropriate for
15 sealing and meet the compelling reasons standard under *Kamakana v. City and County of Honolulu*,
16 447 F.3d 1172 (9th Cir. 2006):

- 17 • **Exhibit B:** Excerpts of the Deposition of Brian Greenspun, dated March 23, 2022.
18 The sensitive portions referenced in the Reply have been designated as
19 “Confidential” by the Sun pursuant to the parties’ Confidentiality and Protective
20 Order (ECF No. 87) (the “Protective Order”).
- 21 • **Exhibit C:** Excerpts of the Deposition of Robert Picard, dated March 21, 2023. The
22 sensitive portions referenced in the Reply have been designated as “Confidential”
23 by the Sun pursuant to the parties’ Protective Order.
- 24 • **Exhibit D:** Excerpts of Robert Picard Initial Expert Report, dated September 19,
25 2022. Dr. Picard’s expert report has been designated “Confidential” by the Sun
26 pursuant to the parties’ Protective Order.
- 27 • **Exhibit E:** Excerpts of Robert Picard Rebuttal Expert Report, dated January 18,
28 2023. Dr. Picard’s expert report has been designated “Confidential” by the Sun

pursuant to the parties' Protective Order.

- **Exhibit G:** Excerpts of Transcript of Arbitration Proceedings, Day 7, AM Session, in AAA Case No. 01-18-0000-7567, dated April 26, 2019. The 2019 arbitration materials have previously been ordered sealed by the Nevada State District Court and the Nevada Supreme Court. This Court has agreed that they shall remain sealed in these proceedings.
- **Exhibit H:** Excerpts of Transcript of Arbitration Proceedings, Day 8, in AAA Case No. 01-18-0000-7567, dated May 9, 2019. The 2019 arbitration materials have previously been ordered sealed by the Nevada State District Court and the Nevada Supreme Court. This Court has agreed that they shall remain sealed in these proceedings.

3. The parties also understand that the deposition pages/lines attached to the Reply may contain other lines on the same deposition pages marked by the parties as Confidential and/or Highly Confidential that are unrelated to, or not referenced/quoted in, the Reply. The parties agree to redact any other lines designated as Confidential and/or Highly Confidential that are contained in the deposition pages attached to the Reply and that neither party is conceding to its confidentiality for the purpose of this Reply.

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IT IS SO ORDERED.



Anne R. Traum
United States District Court Judge

DATED: September 5, 2023